



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 27, 2023

**BY ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Benjamin Case, et al. v. City of New York, et al.,  
14-CV-9148 (JLR) (BCM)

Your Honor:

I am the attorney assigned to represent defendants in the above-referenced matter. Defendants write to respectfully request an enlargement of the deadlines for pre-trial submissions in this matter. Plaintiff's counsel consents to this request.

This request is made due to the recent substitution of the undersigned as counsel and scheduling conflicts with the current pre-trial submission schedule. The undersigned was recently substituted as counsel in this matter, upon the departure of Mr. Louis from this Office. The undersigned was also engaged in a trial matter in the Eastern District of New York from January 17, 2023, until yesterday, January 26, 2023.<sup>1</sup> Thus, the undersigned has not had an opportunity yet to sufficiently review this matter in order to prepare pre-trial submissions. Additionally, the undersigned will be taking parental leave starting February 6, 2023, for approximately four weeks, and will not be available to respond to motions *in limine* on the current schedule.

Counsel for all parties have conferred and based on the foregoing scheduling conflicts, and plaintiff's counsel's availability, defendants respectfully request the Court enlarge the deadlines for pre-trial submissions as follows:

- Joint requests to charge, verdict form, *voir dire*, and motions *in limine* to be filed on or before March 30, 2023; and


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<sup>1</sup> Rao v. City of N.Y., et al., 14-cv-7422. Jury selection took place on January 9-10, 2023, and a pre-trial hearing was held on January 11, 2023.

- Opposition to motions *in limine* to be filed on or before April 7, 2023.

Defendants thank the Court for its consideration .

Respectfully submitted,

  
/s/

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Hannah V. Faddis  
*Senior Counsel*

cc: *All Counsel of Record*